

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

)	
DODORA UNIFIED COMMUNICATIONS,)	
INC.,)	
Plaintiff,)	
)	Civil Action No.
v.)	05-10016-NMG
)	
DIRECT INFORMATION PVT. LTD.,)	
LOGICBOXES, WEBHOSTING. INFO.,)	
TRANSECUTE (I) PVT. LTD.,)	
RESELLERSRS, INC., AND)	
ANSWERABLE, INC., COLLECTIVELY)	
d/b/a "DIRECTI.COM")	
Defendants.)	
)	

DIRECT INFORMATION PVT. LTD's RULE 26(a) DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A), the defendant Direct Information PVT. Ltd. ("Directi") makes the following disclosures. Directi reserves the right to supplement these initial disclosures either through subsequent disclosures, discovery or pre-trial submissions.

A. **Individuals Likely To Have Discoverable Information**

1. Bhavin Turakhia, Chief Executive Officer of Directi, 102 Osia Friendship, 4th Gaothan Lane, Mumbai, 400 053, India.

Mr. Turakhia is a principal of Directi and has personal knowledge of the contracts and business dealings with the receiver for Dodora Unified Communications, Inc. ("Dodora") that are at issue in this matter. Mr. Turakhia has specific knowledge of Directi's activities under the agreements it entered into with the receiver.

2. Ron Garraud, Chief Executive Officer of Dodora, 14 Nicholson Street, Lynn, Massachusetts 01905.

Mr. Garraud, as the founder and current principal of Dodora, likely has personal knowledge of the contracts and business dealings at issue in this matter. Mr. Garraud also likely has knowledge concerning Dodora's alleged damages.

3. Michael S. Bernstein, Esq., 1301 Northwest Highway, Suite 204, Garland, Texas 75041.

Mr. Bernstein was the court appointed receiver for Dodora after a default judgment was entered against Dodora in Texas state court in a lawsuit filed by a company named Compana, LLC. In acting as receiver, Mr. Bernstein negotiated the contracts with Directi that are the subject matter of this litigation.

4. Taryn Naidu, President of Pool.com, 43 Auriga Drive, Nepean, Ontario, Canada, K2E 7Y8.

Mr. Naidu has knowledge of Pool.com's relationship with Directi whereby it monetized the batch pool connections of Dodora. Mr. Naidu has knowledge of Pool.com's payments to Directi for Dodora's batch pool connections.

B. Description of Relevant Documents

The documents that will support Directi's claims and defenses consist of the following: (1) correspondence between Dodora's customers and Directi; (2) documents reflecting information that Directi acquired about Dodora's customers as a consequence of its work for Dodora's receiver; (3) correspondence between Directi and Attorney Michael S. Bernstein, the receiver for Dodora; (4) documents reflecting Directi's receipt of payment from Pool.com, which have previously been produced; (5) written contracts

between Dodora and Directi. Directi reserves the right to supplement this response at a later time; (6) internal financial records of Dodora; (7) Dodora's records of its domain names, customers, and registrations; (8) third-party records in the possession of ICANN, VerSign, Poll.com and others.

C. Damages Calculations

Directi has not asserted any claims for damages. It has, however, asserted a request for relief under M.G.L. c. 231, §6F, for which it will seek its attorneys' fees, costs and expenses.

D. Insurance Agreements

Directi does not have an insurance policy that would provide coverage with respect to the claims and defenses at issue in this case.

DIRECT INFORMATION PVT. LTD.,
By its attorneys,

/s Dustin F. Hecker

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Dated: February ____, 2005

CERTIFICATE OF SERVICE

I, Dustin F. Hecker, hereby certify that on this _____ day of February, 2005, I caused a copy of the foregoing to be served by mail, to: David Baker, Esq., 105 Union Wharf, Boston, Massachusetts 02109.

Dustin F. Hecker, Esq.